

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,¹

Debtors.

FTX TRADING LTD., ISLAND BAY
VENTURES, INC., and CLIFTON BAY
INVESTMENTS LLC f/k/a ALAMEDA
RESEARCH VENTURES LLC,

Plaintiffs,

- against -

SKYBRIDGE CAPITAL II, LLC, SKYBRIDGE
GP HOLDINGS LLC, DIGITAL MACRO FUND
LP f/k/a SKYBRIDGE COIN FUND LP, SALT
VENTURE GROUP LLC, ANTHONY
SCARAMUCCI, and BRETT MESSING,

Defendants.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

Adv. Pro. No. 24-50209 (JTD)

**DEFENDANTS' MOTION TO EXCEED THE PAGE LIMIT WITH
RESPECT TO THE MEMORANDUM OF LAW IN SUPPORT OF DEFENDANTS'
MOTION TO COMPEL ARBITRATION AND TO DISMISS AND/OR STAY**

Defendants SkyBridge Capital II, LLC, SkyBridge GP Holdings LLC, Digital Macro Fund LP f/k/a SkyBridge Coin Fund LP, Salt Venture Group LLC, Anthony Scaramucci, and Brett Messing (collectively, "Defendants") submit this motion (the "Motion") for leave to exceed the page limitation imposed by Rule 7007-2(a)(iv) of the Local Rules of Bankruptcy Procedure for

¹ The last four digits of FTX Trading Ltd.'s and Alameda Research LLC's tax identification numbers are 3288 and 4063, respectively. Due to the large number of debtor entities in these chapter 11 cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors' claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

the United States Bankruptcy Court for the District of Delaware (the “Local Rules”) with respect to the *Memorandum of Law in Support of Defendants’ Motion to Compel Arbitration and to Dismiss and/or Stay* (the “Opening Brief”),² filed contemporaneously herewith. In support of the Motion, Defendants respectfully represent as follows.

BACKGROUND

1. On November 8, 2024, Plaintiffs FTX Trading Ltd, Island Bay Ventures, Inc., and Clifton Bay Investments LLC f/k/a Alameda Research Ventures LLC (collectively, “Plaintiffs”) commenced this adversary proceeding by filing the *Complaint for Avoidance and Recovery of Transfers and Obligations Pursuant to 11 U.S.C. §§ 105, 544, 548, and 550 and Del. Code Ann. Tit. 6, §§ 1304 and 1305, for Unjust Enrichment, for Breach of Contract, for Breach of Fiduciary Duties, for Aiding and Abetting Breach of Fiduciary Duties, and for Disallowance of Claims Pursuant to 11 U.S.C. § 502* (the “Complaint”). D.I. 1.

2. On January 7, 2025, the Court entered an order setting January 24, 2025, as the deadline for Defendants to file a response to the Complaint. D.I. 14.

3. On the date hereof, Defendants filed the *Defendants’ Motion to Compel Arbitration and to Dismiss and/or Stay* and Opening Brief.

RELIEF REQUESTED

4. Defendants respectfully request that the Court grant this Motion to exceed the page limit for the Opening Brief by entering an order substantially in the form attached hereto as **Exhibit A** (the “Proposed Order”).

² Capitalized terms used, but not otherwise defined, herein are as defined in the Opening Brief filed contemporaneously herewith.

BASIS FOR RELIEF

5. Local Rule 7007-2 provides that “[w]ithout leave of Court, no opening or answering brief shall exceed thirty (30) pages” Del. Bankr. L.R. 7007-2(a)(iv).³ The Opening Brief is 56 pages.

6. Good cause exists for the Court to allow Defendants to exceed the 30 pages. The Opening Brief addresses arguments in support of dismissal of all 13 causes of action brought against the six defendants. Given the sheer number of claims and defendants, and the joint and individual arguments on issues of federal bankruptcy law, federal procedure, and Delaware state law, Defendants require 26 additional pages beyond those provided for under the Local Rules to adequately brief the arguments set forth in their Opening Brief.

NOTICE

7. A copy of this Motion is being served upon counsel to Plaintiffs. In light of the nature of the relief requested herein, Defendants submit that no other or further notice is required.

NO PRIOR REQUEST

8. No prior motion for the relief requested herein has been made to this or any other court.

CONCLUSION

WHEREFORE, Defendants respectfully request that the Court enter the Proposed Order, substantially in the form attached hereto as **Exhibit A**, granting (i) Defendants leave to exceed the

³ Defendants are aware a revised version of the Local Rules is set to become effective shortly after the filing of this Motion on February 1, 2025. While the text of Local Rule 7007-2(a)(iv) will change slightly, the substance of the rule remains unchanged. The proposed revised language of Local Rule 7007-2(a)(iv) reads in relevant part as follows: “Without leave of Court, no opening or answering brief may exceed 30 pages”

page limitations imposed by Local Rule 7007-2(a)(iv); and (ii) such other and further relief as the Court deems just and proper.

Dated: January 24, 2025
Wilmington, Delaware

Respectfully submitted,

/s/ James R. Risener III

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